

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GREAT NORTHERN INSURANCE CO., as	:	
subrogee of PHYLLIS MACNEIL,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
INTERCITY ALARMS, INC.,	:	C. A. No. 03-CV-12463-RGS
	:	
Defendant/Third-Party Plaintiff,	:	
	:	
v.	:	
	:	
JOHN VOSE,	:	
	:	
Third-Party Defendant.	:	

**MOTION FOR ADMISSION OF  
NORMAN H. BROOKS, JR., *PRO HAC VICE***

Now comes Defendant, Intercity Alarms, Inc., by and through its local counsel, Bradford N. Louison, Merrick, Louison & Costello, LLP, and hereby moves, pursuant to Local Rule 83.5.3(b), for an Order permitting Attorney Norman H. Brooks, Jr. from the law office of Marks, O'Neill, O'Brien & Courtney, P.C. in Wilmington, Delaware, to practice before this Court *Pro Hac Vice* in the above-captioned matter on behalf of the Defendant.

In support of its motion, Defendant states the following:

1. Attorney Brooks is a member in good standing of the highest court in the State of Delaware.
2. Attorney Brooks has an existing attorney/client relationship with Intercity Alarms, Inc.'s excess liability insurance carrier, AIG.

3. Admission of Attorney Brooks would foster the efficient use of the client's and Court's resources in this case.

4. The undersigned has been a member in good standing of the bar of Massachusetts since June, 1987 and a member admitted to practice before this Court since February, 1988 and will be associated with Attorney Brooks in the prosecution of this action.

5. Attorney Brooks has been provided with the Local Rules of this Court and has familiarized himself with these rules. (See Affidavit attached hereto.)

WHEREFORE, Defendant respectfully requests this Honorable Court allow its motion and admit Attorney Norman H. Brooks, Jr. *Pro Hac Vice*.

Respectfully submitted,  
INTERCITY ALARMS, INC.,  
By its attorneys,

/s/ Bradford N. Louison  
Bradford N. Louison, Esquire BBO #305755  
Merrick, Louison & Costello, LLP  
67 Batterymarch Street  
Boston, MA 02110  
(617) 439-0305

#### **CERTIFICATE OF SERVICE**

I, Bradford N. Louison, hereby certify that on the 2<sup>nd</sup> day of February 2006, I served the foregoing electronically and by causing a copy to be mailed, postage prepaid, directed to Roy P. Giarrusso, Giarrusso, Norton, Cooley & McGlone, P.C., Marina Bay, 308 Victory Rd., Quincy, MA 02171; A. Richard Bailey, Cozen O'Connor, Attorneys, 1900 Market St., Philadelphia, PA 19103-3508; Norman H. Brooks, Jr., O'Neill, O'Brien & Courtney, P.C., 913 Market St., Suite 800, Wilmington, DE 19801

/s/ Bradford N. Louison  
Bradford N. Louison



